United States Courts Southern
District of Texas
FILED

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

04/20/2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

\$ CASE NO. 4:22-CR-194

v. \$ \$
QUAYLON DAVON BROWN,
JAVARION BIJON DAVIS,
PRENTIS LEEWOOD DELANEY II, and \$
ALBERT JOE MURPHY II,
DEFENDANTS. \$ UNDER SEAL

**INDICTMENT** 

Sealed

THE GRAND JURY CHARGES THAT:

Public and unofficial staff access to this instrument are prohibited by court order

#### **INTRODUCTION**

At all times material to this Indictment, Loomis Armored US, is a cash handling company that operates throughout the United States, engaged in the business of the secure transport of assets, including United States currency, which activities are in interstate commerce, and which affect interstate commerce.

## **COUNT ONE**

## Aiding and Abetting Interference with Commerce by Robbery

On or about October 24, 2019, in the Houston Division of the Southern District of Texas,

## QUAYLON DAVON BROWN, JAVARION BIJON DAVIS, PRENTIS LEEWOOD DELANEY II, and ALBERT JOE MURPHY II,

defendants herein, aiding and abetting each other and other individuals, known and unknown to the Grand Jury, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendants did unlawfully take and obtain the property of Loomis Armored US, at 5026 Antoine Road, Houston, Texas, which was in the possession and custody of an employee of Loomis Armored US, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a), and 2.

## **COUNT TWO**

Aiding and Abetting Discharge of a Firearm During and in Relation to a Crime of Violence

On or about October 24, 2019, in the Houston Division of the Southern District of Texas,

QUAYLON DAVON BROWN, JAVARION BIJON DAVIS, PRENTIS LEEWOOD DELANEY II, and ALBERT JOE MURPHY II,

defendants herein, aiding and abetting each other and other individuals, known and unknown to the Grand Jury, did knowingly brandish and discharge a firearm, namely, a handgun, during and in relation to a crime of violence for which one or more of them may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count One, and did cause the death of a person, to wit: Francis Hazzard, by the use of that firearm.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(iii), 924(j)(1), and 2.

#### NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, §§ 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice to defendant,

# QUAYLON DAVON BROWN, **JAVARION BIJON DAVIS,** PRENTIS LEEWOOD DELANEY II, and ALBERT JOE MURPHY II,

that upon conviction of discharge of a Firearm During a Crime of Violence, as charged in Count Two, all firearms and ammunition involved in or used in a violation of Title 18, United States Code, §§ 924(c)(1)(A)(iii), 924(j)(1), and 2, are subject to forfeiture.

A TRUE BILL:

**ORIGINAL SIGNATURE ON FILE** 

JENNIFER B. LOWERY United States Attorney

BY:

Assistant United States Attorney